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ROBERT ALEXANDER KASEBERG

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

ROBERT ALEXANDER KASEBERG,

Plaintiff,

vs.

CONACO, LLC; TURNER
BROADCASTING SYSTEM; TIME
WARNER, INC.; CONAN O' BRIEN;
JEFF ROSS; MIKE SWEENEY; and
DOES 1-100, Inclusive,

Defendants.

Case No.: 15-CV-01637-JLS-DHB

Hon. Janis L. Sammartino

**PLAINTIFF ROBERT ALEXANDER
KASEBERG'S NOTICE OF MOTION
AND MOTION FOR JUDGMENT ON
THE PLEADINGS AND/OR PARTIAL
SUMMARY JUDGMENT AS TO
DEFENDANTS' FRAUD ON THE
COPYRIGHT OFFICE AND
UNCLEAN HANDS AFFIRMATIVE
DEFENSES**

DATE: July 26, 2018

TIME: 1:30 p.m.

COURTROOM: 4D

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on July 26, 2018, at 1:30 p.m. in Courtroom 4D of
3 this Court, located at 221 West Broadway, San Diego, CA 92101, Plaintiff Robert
4 Alexander Kaseberg ("Plaintiff") will move for judgment on the pleadings and/or partial
5 summary judgment as to Defendants' affirmative defenses of Fraud on the Copyright
6 Office and Unclean Hands. Plaintiff's motion is based on Rules 12c and 56a of the Federal
7 Rules of Civil Procedure, and on the grounds that even if all of the material facts alleged
8 in Defendants' affirmative defenses are true, Plaintiff is entitled to judgment as a matter
9 of law or alternatively there is no genuine dispute of material fact related to the affirmative
10 defenses and Plaintiff is entitled to judgment as a matter of law.

11 This motion will be based upon this Notice of Motion and Motion, the supporting
12 Memorandum of Points and Authorities, the supporting Declaration of Jayson M. Lorenzo
13 and supporting exhibits, the Request for Judicial Notice, the Separate Statement of
14 Material Facts, all pleadings and files on paper in this action, and any additional matter
15 or argument that this Court may consider at the hearing of this motion.

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17 Respectfully submitted,

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19 Date: May 9, 2018

By: /s/ Jayson M. Lorenzo
JAYSON M. LORENZO
Attorney for Plaintiff
ROBERT ALEXANDER KASEBERG